

1 Joseph R. Saveri (*pro hac vice*)
2 JOSEPH SAVERI LAW FIRM, INC.
3 555 Montgomery Street, Suite 1210
San Francisco, California 94111
3 Telephone: (415) 500-6800 Facsimile:
(415) 395-9940
4 jsaveri@saverilawfirm.com

5 Richard A. Koffman (*pro hac vice*)
COHEN MILSTEIN SELLERS & TOLL, PLLC
6 1100 New York Ave., N.W., Suite 500, East Tower
Washington, DC 20005
7 Telephone: (202) 408-4600
Facsimile: (202) 408 4699
8 rkoffman@cohenmilstein.com

9 Eric L. Cramer (*pro hac vice*)
BERGER & MONTAGUE, P.C.
10 1622 Locust Street
Philadelphia, PA 19103
11 Telephone: (215) 875-3000
Facsimile: (215) 875-4604
12 ecramer@bm.net

13 *Co-Lead Counsel for the Classes and*
Attorneys for Individual and Representative Plaintiffs
14 *Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez,*
Brandon Vera, and Kyle Kingsbury
15

16 [Additional counsel appear on signature page]

17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 **Cung Le, Nathan Quarry, Jon Fitch, Brandon**
Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
others similarly situated,

Case No.: 2:15-cv-01045 RFB-(PAL)

PLAINTIFFS' MOTION FOR LEAVE TO
LODGE MATERIALS UNDER SEAL

21 **Plaintiffs,**

22 **vs.**

23 **Zuffa, LLC, d/b/a Ultimate Fighting**
Championship and UFC,

24 **Defendant.**

1 Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Local Rule 10-5(a),
 2 and Section 14.3 of the Revised Stipulation and Protective Order (the “Protective Order”) issued by
 3 this Court on February 10, 2016 (ECF No. 217 at 15), Plaintiffs Cung Le, Nathan Quarry, Jon Fitch,
 4 Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all others
 5 similarly situated (collectively, “Plaintiffs”) hereby move this Court for leave to lodge certain
 6 documents under seal related to their Reply Brief in Support of Emergency Motion to Compel
 7 Production of Documents Withheld on Privilege Grounds and for Other Relief.

8 Under Section 14.3 of the Protective Order, documents designated Confidential or Highly
 9 Confidential – Attorneys’ Eyes Only “shall be provisionally lodged under seal with the Court, and
 10 redacted papers shall be publicly filed. Within 5 days of the materials being lodged with the Court,
 11 the Party claiming protection shall file motion to seal setting forth the bases for sealing and proper
 12 authority under *Kamakana v. City & County of Honolulu*, 447 F.3d 1172 (9th Cir. 2006), or some
 13 other applicable authority.”

14 Plaintiffs seek leave to lodge under Exhibits 6, 7, 8, and 9 to the Saveri Declaration, which
 15 are documents that have been designated Confidential or Highly Confidential – Attorneys’ Eyes
 16 Only or portions of Zuffa’s privilege log.

17 Plaintiffs have filed all of these documents under seal, in accordance with the Court’s ECF
 18 system, with the instant motion. Plaintiffs have publicly filed placeholders for redacted versions of
 19 these documents with the Court, and will serve un-redacted versions of these documents on
 20 Defendant.

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 DATED this 24th day of July, 2017.

2 **JOSEPH SAVERI LAW FIRM, INC.**

3 By: /s/ Kevin E. Rayhill

4 Kevin E. Rayhill

5 Joseph R. Saveri (admitted *pro hac vice*)
6 Joshua P. Davis (admitted *pro hac vice*)
7 Kevin E. Rayhill (admitted *pro hac vice*)
8 555 Montgomery Street, Suite 1210
9 San Francisco, California 94111
10 Phone: (415) 500-6800/Fax: (415) 395-9940
11 jsaveri@saverilawfirm.com
12 jdavis@saverilawfirm.com
13 krayhill@saverilawfirm.com

14

15 *Co-Lead Counsel for the Classes and Attorneys for*
16 *Individual and Representative Plaintiffs Cung Le, Nathan*
17 *Quarry, Jon Fitch, Luis Javier Vazquez, Brandon Vera,*
18 *and Kyle Kingsbury*

19 **COHEN MILSTEIN SELLERS & TOLL, PLLC**

20 Benjamin D. Brown (admitted *pro hac vice*)
21 Richard A. Koffman (admitted *pro hac vice*)
22 Daniel H. Silverman (admitted *pro hac vice*)
23 1100 New York Ave., N.W., Suite 500, East Tower
24 Washington, DC 20005
25 Phone: (202) 408-4600/Fax: (202) 408 4699
26 bbrown@cohenmilstein.com
27 rkoffman@cohenmilstein.com
28 dsilverman@cohenmilstein.com

29 *Co-Lead Counsel for the Classes and Attorneys for*
30 *Individual and Representative Plaintiffs Cung Le,*
31 *Nathan Quarry, Jon Fitch, Luis Javier Vazquez,*
32 *Brandon Vera, and Kyle Kingsbury*

BERGER & MONTAGUE, P.C.
Eric L. Cramer (admitted *pro hac vice*)
Michael Dell'Angelo (admitted *pro hac vice*)
Patrick Madden (admitted *pro hac vice*)
1622 Locust Street
Philadelphia, PA 19103
Phone: (215) 875-3000/Fax: (215) 875-4604
ecramer@bm.net
mdellangelo@bm.net
pmadden@bm.net

Co-Lead Counsel for the Classes and Attorneys for Individual and Representative Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Brandon Vera, and Kyle Kingsbury

**WOLF, RIFKIN, SHAPIRO,
SCHULMAN & RABKIN, LLP**
Don Springmeyer
Nevada Bar No. 1021
Bradley S. Schrager
Nevada Bar No. 10217
Justin C. Jones
Nevada Bar No. 8519
3556 E. Russell Road, Second Floor
Las Vegas, Nevada 89120
(702) 341-5200/Fax: (702) 341-5300
dspringmeyer@wrslawyers.com
bschrager@wrslawyers.com
jjones@wrslawyers.com

Liaison Counsel for the Classes and Attorneys for Individual and Representative Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Brandon Vera, and Kyle Kingsbury

1 **WARNER ANGLE HALLAM JACKSON &**
2 **FORMANEK PLC**

3 Robert C. Maysey (admitted *pro hac vice*)
4 Jerome K. Elwell (admitted *pro hac vice*)
5 2555 E. Camelback Road, Suite 800
6 Phoenix, AZ 85016
7 Phone: (602) 264-7101/Fax: (602) 234-0419
8 rmaysey@warnerangle.com
9 jelwell@warnerangle.com

7 *Counsel for the Classes and Attorneys for Individual and*
8 *Representative Plaintiffs Cung Le, Nathan Quarry, Jon*
9 *Fitch, Luis Javier Vazquez, Brandon Vera, and Kyle*
9 *Kingsbury*

10 **LAW OFFICE OF FREDERICK S. SCHWARTZ**

11 Frederick S. Schwartz (admitted *pro hac vice*)
12 15303 Ventura Boulevard, #1040
13 Sherman Oaks, CA 91403
14 Phone: (818) 986-2407/Fax: (818) 995-4124
15 fred@fredschwartzlaw.com

16 *Attorneys for Plaintiffs*

17 **SPECTOR ROSEMAN KODROFF & WILLIS,**
18 **P.C.**

19 Jeffrey J. Corrigan (admitted *pro hac vice*)
20 William G. Caldes (admitted *pro hac vice*)
21 1818 Market Street – Suite 2500
22 Philadelphia, PA 19103
23 Phone: (215) 496-0300/Fax: (215) 496-6611
24 jcorrigan@srgw-law.com
25 wcaldes@srgw-law.com

26 *Attorneys for Plaintiffs*

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of July, 2017 a true and correct copy of
PLAINTIFFS' MOTION TO LODGE MATERIALS UNDER SEAL was served via the
United States District Court CM/ECF system on all parties or persons requiring notice.

By:

/s/ Kevin E. Rayhill

Kevin E. Rayhill